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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CASE NO: JKB-25-020

DAZHON DARIEN,

Defendant.

MOTION FOR ENTRY OF A PROTECTIVE ORDER GOVERNING DISCLOSURE OF PROTECTED IDENTITY, FINANCIAL, CONTACT, GRAND JURY, TAX, COURT, AND INVESTIGATIVE INFORMATION

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, United States hereby moves for entry by this Court of a protective order that will ensure the confidentiality of Protected Identity, Financial, Contact, Grand Jury, Court, and Investigative Information (collectively, "Protected Information"), which is or may be included within the evidence in this case.

Entry of a protective order restricting the use, dissemination and disposition of documents containing Protected Information is essential to permit the parties to disclose extensive discovery while protecting the Protected Information of the victims in this case and other individuals.

The United States conferred with counsel for the Defendant regarding a draft protective order proposed by the United States (the "Proposed Protective Order") and have reached an agreement with respect to all of the provisions contained therein.

A copy of the Proposed Protective Order is submitted herewith.

Respectfully submitted,

Philip A. Selden Acting United States Attorney

By: ______/s/ Christine Goo

Christine Goo
Paul Budlow

Assistant United States Attorneys